DrinkerBiddle&Reath LLP

DOCKET FILE COPY ORIGINAL

Timothy R. Hughes
202-842-8895
hughestr@dbr.com

1500 K Street N.W.
Suite 1100
Washington, DC
20005-1209

202-842-8800
202-842-8465 FAX
www.dbr.com

PHILADELPHIA
WASHINGTON
BERWYN
NEW YORK

DrinkerBiddle&Shanley LLP
PRINCETON
FLORHAM PARK

November 9, 2000

RECEIVED

NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-A325
Washington, DC 20554

Re: Celulares Telefonica E911 Phase II Implementation Report
In CC Docket No. 94-102

Dear Secretary Salas:

Enclosed, please find an original and five copies of Celulares Telefonica, Inc.'s E911 Phase II Implementation Report submitted in the above-referenced proceeding pursuant to 47 C.F.R. § 20.18(i).

Please date-stamp and return one of the enclosed copies to us, via our messenger.

Please call me at (202) 842-8895 with any questions or concerns regarding this submission.

Sincerely,

Timothy R. Hughes

TRH

Enclosure

150th ANNIVERSARY 1849-1999

No. of Copies rec'd 0+4
List ABCDE

DC\309338\1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Wireless Telecommunications Bureau	)	
Guidelines for Waivers for Handset Based	)	CC Docket No. 94-102
Approaches to Wireless Enhanced 911	)	
Phase II Automatic Location Identification	)	
Requirements	)	

E911 PHASE II IMPLEMENTATION REPORT OF CELULARES TELEFONICA

Pursuant to 47 C.F.R. § 20.18(i), Celulares Telefónica, Inc. ("CT"), the CMRS affiliate of Puerto Rico Telephone Company, Inc., hereby reports its plans for implementing Phase II enhanced E911 service in Puerto Rico.

In its E911 First Report and Order,[1] the Commission did not specify what type of ALI technology carriers must use to comply with Section 20.18(e) of the Commission's rules.[2] During the course of proceedings in CC Docket No. 94-102, wireless carriers have been left to determine for themselves whether a network-based approach or handset-based approach would be a more economically, operationally and technologically efficient means by which to comply with the Commission's Phase II automatic location identification ("ALI") requirements.

---

[1] Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, First Report and Order, 11 FCC Rcd 18676 (1996) ("E911 First Report and Order"), recon. 12 FCC Rcd 22665 (1997) ("E911 Reconsideration Order"

[2] E911 First Report and Order, 11 FCC Rcd at 18732; E911 Reconsideration Order, 12 FCC Rcd at 22725-22726.

CT has opted for a network-based solution to the E911 Phase II requirements. Specifically, CT has been working with its ALI solution vendor, True Position Wireless Location Systems ("True Position"), to develop a technical solution that will enable it to comply with the Commission's October 1, 2001 deadline to deploy E911 Phase II technologies. The True Position Wireless Location System is a location system that will be implemented as an overlay network to CT's existing communications network. The primary application for which the True Position was originally developed was to comply with the FCC's E911 requirements. True Position relies upon the time difference of arrival of wireless signals and incorporates multipath mitigation as the core of its location technology.

In the E911 Third Report and Order, the Commission revised its the accuracy and reliability requirements for network-based solutions.[3] The Commission further clarified its position in the E911 Fourth Memorandum and Order[4] and released OET Bulletin No. 71 entitled, "Guidelines for Testing and Verifying the Accuracy of Wireless E911 Location Systems" on April 12, 2000. In order to verify conformance with the E911 Phase II accuracy requirements, CT is employing the empirical testing method outlined in the bulletin. Specifically, CT will make an accuracy measurement at each point of a sample set of locations randomly selected. Subsequently, tests will be performed at each of these sample locations to determine the distance between the actual location and the location reported by the ALI system. A sufficient number of

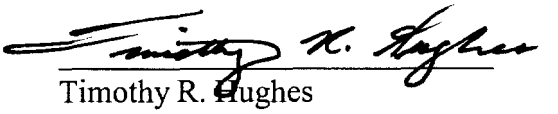
[3] Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Third Report and Order, 14 FCC Rcd 17388 (1999) ("E911 Third Report and Order")

[4] E911 Fourth Memorandum and Order, CC Docket No. 94-102, FCC 00-326 (rel. Sept. 8, 2000).

observations will be included to establish compliance with the Commission's accuracy requirements with a statistical confidence of at least ninety percent.

While CT continues to work with True Position to implement and verify the accuracy of its chosen network-based solution, this report does not constitute a final or irrevocable commitment by CT. As recognized by the Commission in the E911 Third Report and Order, carriers may make good faith changes in their plans even after the filing of their implementation reports, including changes in ALI technologies.[5] In the event that CT's current implementation plan proves undesirable or infeasible, CT will file a revised implementation plan within thirty days of the adoption of any such change, as required by 47 C.F.R. § 20.18(i).

Respectfully submitted,



Timothy R. Hughes
DRINKER BIDDLE & REATH LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005-1209
(202) 842-8800

Attorneys for
CELULARES TELEFONICA, INC.

Dated: November 9, 2000

[5] E911 Third Report and Order, 14 FCC Rcd at 17428.